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10 **IN THE UNITED STATES DISTRICT COURT**
11 **FOR THE DISTRICT OF NEVADA**

12 Todd C. Engel,
13 Plaintiff,
14 v.
15 United States of America, *et al.*,
16 Defendants.

WQH-EJY
No. 2:22-cv-01040-~~JCM-NJK~~

**UNOPPOSED MOTION TO EXTEND
TIME TO FILE RESPONSIVE
PLEADING
(FIRST REQUESTED EXTENSION)**

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18 Defendant United States of America hereby moves pursuant to Federal Rule of Civil
19 Procedure 6(b)(1) and Local Rule LR IA 6-1, for a 60-day extension of time to November
20 4, 2022, to file a responsive pleading to Plaintiff's Complaint (Doc. 1).

21 This is Defendants' first requested extension of time in this matter.

22 Counsel for United States has an unusually heavy workload with a high number of
23 filings due to be completed in the next three weeks, and has a trial scheduled to begin on
24 September 12, 2022, followed by a long-scheduled vacation starting on September 26,
25 2022. Furthermore, the responsive pleading in this matter requires review and comment by
26 counsel for multiple federal agencies before filing. The case styled *Joseph O'Shaughnessy*
27 *v. United States of America*, 2:22-cv-01040-APG-DJA concerns many of the same events
28 and the same attorneys as the above captioned case and was filed the same day. An

1 identical unopposed motion to extend has been filed in the *O'Shaughnessy* case.

2 Undersigned counsel Heathcotte affirms that Plaintiff's counsel Marquiz consents
3 to the granting of this motion.

4 For the foregoing reasons, Defendant respectfully requests that the deadline to file
5 a responsive pleading to the Complaint be extended to November 4, 2022.

6 RESPECTFULLY SUBMITTED this August 22, 2022.

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8 MERRICK GARLAND
 United States Attorney General

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10 s/ Brock Heathcotte
 BROCK HEATHCOTTE
 Special Assistant United States Attorney, Acting
 Under Authority Conferred by 28 U.S.C. § 515
 Attorneys for Defendant United States

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15 IT IS SO ORDERED:

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17 UNITED STATES MAGISTRATE JUDGE

18 DATED: August 22, 2022
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